

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF DANIEL A. NIGH IN SUPPORT OF PLAINTIFFS' DAUBERT
REPLY BRIEF TO EXCLUDE THE OPINIONS OF DEFENSE' EXPERT MARK
ROBBINS.**

DANIEL A. NIGH, hereby certifies as follows:

1. I am an attorney at law within the State of Florida and a shareholder with the law firm of Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A., and serve as Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification exclude opinions of the testimony of Dr. Mark Robbins. To reduce confusion, I have kept Exhibit Numbers consistent from the Plaintiff's Motion to Exclude Dr. Robbins.

2. Attached hereto as **Exhibit 2** is a true and accurate copy of Mark Robbins' Deposition Testimony taken March 8, 2022.

3. Attached hereto as **Exhibit 10** is a true and accurate copy of the invoice received from Analysis Group

4. Attached hereto as **Exhibit 11** is a true and accurate copy of *Manning v. Crockett*, No. 95-C3117, 1999 WL 342715 (N.D.Ill. May 18, 1999).

5. Attached hereto as **Exhibit 12** is a true and accurate copy of *Bank of New York Mellon v. WMC Mortgage, LLC*, 2015 WL 4887446 (S.D.N.Y. Aug. 17, 2015).

6. Attached hereto as **Exhibit 13** is a true and accurate copy of *In re M/V MSC Flaminia*, 2017 WL 3208598 (S.D.N.Y. July 28, 2017).

7. Attached hereto as **Exhibit 14** is a true and accurate copy of *Pac. Life Ins. Co. v. Bank of New York Mellon*, 2021 WL 5299193 (S.D.N.Y. Nov. 15, 2021).

8. Attached hereto as **Exhibit 16** is a true and accurate copy of *Salinero v. Johnson & Johnson*, 2019 WL 7753453 1 (S.D. Fla. Sept. 5, 2019).

9. Attached hereto as **Exhibit 17** is a true and accurate copy of Mr. Quick's Expert Report.

Dated: June 16, 2022

Respectfully submitted:

/s/Daniel A. Nigh
Daniel A. Nigh
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Buchanan, O'Brien, Barr & Mougey, P.A.**
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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/Daniel A. Nigh
Daniel A. Nigh
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